

IN THE UNITED STATES OF AMERICA
EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION

FILED
U.S. DISTRICT COURT
EASTERN DISTRICT OF TEXAS

MAY 22 2014

BY DAVID J. MALAND, CLERK
DEPUTY

UNITED STATES OF AMERICA §
§
v. §
§
JOE AMIDI §

NO. 4:14 CR 100
Judge *Crone*

ELEMENTS OF THE OFFENSE

The defendant, **Joe Amidi**, (**Amidi**) is charged in Count One of the Information with a violation of 21 U.S.C. § 846 which makes it a crime for anyone to conspire with someone else to commit a violation of certain controlled substances laws of the United States. In this case, **Amidi** is charged with conspiring to possess with intent to distribute a controlled substance or controlled substances.

1. That two or more persons, directly or indirectly, reached an agreement to possess with intent to distribute a controlled substance or controlled substances.
2. That the defendant knew of the unlawful purpose of the agreement; and
3. That the defendant joined in the agreement willfully, that is, with the intent to further its unlawful purpose.

Respectfully submitted,

JOHN M. BALES
United States Attorney

_____/s/_____
HEATHER RATTAN
Assistant United States Attorney
Texas Bar No. 19349300
101 E. Park Blvd., Suite 500
Plano, Texas 75074
(972) 509-1201
(972) 509-1209 (fax)
Heather.Rattan@usdoj.gov

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was filed via electronic filing to defense counsel on this the 21th day of May, 2013.

_____/s/_____
HEATHER RATTAN